BEFORE

THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2021-324-WS

Application of Kiawah Island Utility,)	
Incorporated to File Proposed Changes)	
in Rates, Charges, Classifications and/or)	PETITION TO INTERVENE
Regulations for Water and Sewer)	
Service)	

The Town of Kiawah Island ("Petitioner" or "Town") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to Rule 103-825 of its Rules of Practice and Procedure (10 S.C. Code Ann. Regs. 103-825), to be allowed to intervene as a formal party of record in the above-captioned proceeding. In support of this Petition, Petitioner would show as follows:

- 1. Kiawah Island Utility, Incorporated ("Applicant") filed an Application for approval to increase its rates for water and sewer services for its customers in the Town of Kiawah Island.
- 2. The Town of Kiawah Island is home to approximately 1,779 permanent residents, and numerous temporary residents each year. Citizens of the Town and businesses operating in the Town are current or potential customers of Applicant's water and sewer services.
- 3. As such, the Town and its residents and businesses have a vital interest in this proceeding. Petitioner's residents and businesses who are residential and commercial water and sewer customers will be affected by the proposed rate increase because it would increase their water and sewer service rates.

- 4. At this time, Petitioner opposes the proposed rate increase, but does not possess sufficient information to form a more detailed position in this proceeding. Participation in this Docket will allow Petitioner to obtain the information necessary to establish that position.
- 5. Petitioner seeks to participate in this proceeding in order to more fully establish and assert their position and in order to assist in addressing the important issues raised. Petitioner should therefore be permitted to intervene in this proceeding in order to participate fully and present testimony and other evidence as appropriate.
 - 6. Petitioners' authorized representative in this proceeding is:

John J. Pringle, Jr. **ADAMS AND REESE LLP**1501 Main Street, 5th Floor
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7. Petitioner requests that it be allowed to intervene in the above-captioned matter, that it be permitted to participate fully as parties of record, to present testimony, cross-examine witnesses, and assert whatever position it deems to be appropriate.

WHEREFORE, Petitioner prays for the following relief:

- a. That the Commission accept this Petition to Intervene and make Petitioner an intervenor and party of record;
- b. That the Commission allow Petitioner to participate fully in this proceeding and take such positions as it deems advisable; and
- c. That the Commission grant such other and further relief as is just and proper.

Respectfully submitted,

ADAMS AND REESE, LLP

s/John J. Pringle, Jr.
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Attorneys for the Town of Kiawah Island

January 7, 2022 Columbia, South Carolina

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2021-324-WS

Application of Kiawah Island Utility,)	
Incorporated to File Proposed Changes)	CERTIFICATE OF SERVICE
in Rates, Charges, Classifications and/or)	CERTIFICATE OF SERVICE
Regulations for Water and Sewer Service)	
)	

This is to certify that I have served the **Petition to Intervene** of the Town of Kiawah Island via electronic mail service as follows:

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s/John J. Pringle, Jr. John J. Pringle, Jr.

January 7, 2022 Columbia, South Carolina